

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Williams Four Corners LLC	Contact Kijun Hong
Address 1755 Arroyo Dr., Bloomfield, NM 87413	Telephone No. 505-632-4475
Facility Name Culpepper CDP	Facility Type Compressor Station
Surface Owner BLM	Mineral Owner
API No.	

LOCATION OF RELEASE

Unit Letter A	Section 1	Township 31N	Range 13W	Feet from the	North/South Line	Feet from the	East/West Line	County San Juan
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Latitude **36.933175** Longitude **-108.149058**

NATURE OF RELEASE

Type of Release Natural Gas and Lube Oil	Volume of Release 125 MCF Natural Gas 3 Gal Lube Oil	Volume Recovered 0 MCF
Source of Release Emergency Shut Down (ESD) vent	Date and Hour of Occurrence 12/1/2016, 02:00 PM MST	Date and Hour of Discovery 12/1/2016, 02:00 PM MST
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

OIL CONS. DIV DIST. 3

DEC 15 2016

If a Watercourse was Impacted, Describe Fully.*

N/A

Describe Cause of Problem and Remedial Action Taken.*

Tubing on the ESD valve froze causing valve to actuate and ESD vent to open releasing natural gas and lube oil.

Describe Area Affected and Cleanup Action Taken.*

Impacts from lube oil remained inside the fence line and has been remediated.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Kijun Hong	Approved by Environmental Specialist: 	
Title: Environmental Specialist	Approval Date: 1/10/17	Expiration Date: —
E-mail Address: Kijun.Hong@williams.com	Conditions of Approval: Area Needs to Be Sampled	Attached <input checked="" type="checkbox"/>
Date: 12/12/2016	Phone: 505-632-4475	TPH (Dro - mro - Gro), BTEX

* Attach Additional Sheets If Necessary **#docs 1701039773**



Operator/Responsible Party,

The OCD has received the form C-141 you provided on 12/15/16 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ACS 170103973 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District III office in Aztec on or before 2/10/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3465

jim.griswold@state.nm.us

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Oil Conservation Division
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Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR Initial Report Final Report

Name of Company Williams Four Corners LLC	Contact Michael Hannan
Address 1754 Arroyo Dr., Bloomfield, NM 87413	Telephone No. 505-632-4807
Facility Name Milagro Gas Plant	Facility Type Facility

Surface Owner Private	Mineral Owner	API No.
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LOCATION OF RELEASE

Unit Letter O	Section 12	Township 29N	Range 11W	Feet from the	North/South Line	Feet from the	East/West Line	County San Juan
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Latitude 36.735966° N Longitude -107.942329° W

NATURE OF RELEASE

Type of Release Natural Gas	Volume of Release 261 MCF	Volume Recovered 0 MCF
Source of Release Pressure Relief Valve	Date and Hour of Occurrence 11/29/16 at 12:40 AM MT	Date and Hour of Discovery 11/29/16 at 12:40 AM MST
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

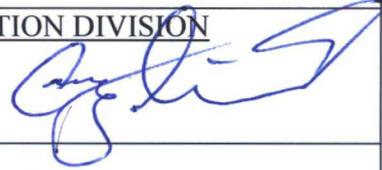
OIL CONS. DIV DIST. 3

DEC 08 2016

Describe Cause of Problem and Remedial Action Taken.*
During abnormal operations at Milagro on 11/29/2016 at 12:40 AM, PSV-44403 on Train 4 relieved for approximately 20 minutes while operations was troubleshooting an unexpected trip on Boiler #5. Operations was able to lower the pressure and reseal the PSV to stop the venting at 1:00 AM on 11/29/2016. The estimated volume lost to atmosphere is 261 MSCF, based on system pressure reached during relief, and known PSV orifice size and capacity.

Describe Area Affected and Cleanup Action Taken.*
No clean-up required for natural gas releases vented to atmosphere.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Michael Hannan	Approved by Environmental Specialist: 	
Title: Engineer, Sr.	Approval Date: 11/10/17	Expiration Date:
E-mail Address: michael.hannan@williams.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 12/05/2016	Phone: 505-632-4807	

* Attach Additional Sheets If Necessary

#NCS 17010 37829

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Release Notification and Corrective Action

OPERATOR Initial Report Final Report

Name of Company Williams Four Corners LLC	Contact Mitch Morris
Address 1755 Arroyo Drive, Bloomfield, NM 87413	Telephone No. 505-632-4708
Facility Name Kutz Canyon Gas Plant	Facility Type Natural Gas Processing Plant

Surface Owner Bureau of Land Management	Mineral Owner	API No.
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LOCATION OF RELEASE

Unit Letter D	Section 13	Township 28N	Range 11W	Feet from the	North/South Line	Feet from the	East/West Line	County San Juan
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Latitude 36° 40.064 N Longitude 107° 57.795 W

NATURE OF RELEASE

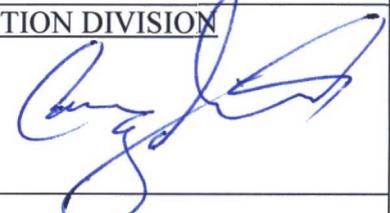
Type of Release Natural Gas	Volume of Release 104.7 MCF	Volume Recovered 0
Source of Release Pressure Relief Valve (PRV)	Date and Hour of Occurrence 11/18/2016, 03:05 PM MST	Date and Hour of Discovery 11/18/2016, 03:05 PM MST
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Vanessa Fields/Whitney Thomas via phone call and voicemail	
By Whom? Mitch Morris	Date and Hour 11/21/2016 8:28 am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. Not Applicable	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
A downstream customer lost compression, causing increased pressures at the plant tailgate. This resulted in a pressure relief valve (PRV) opening, resulting in the release of 140.7 MCF of residue natural gas to atmosphere. PRV's are designed to open at a pre-determined setpoint to protect piping and vessels from dangerous over-pressure conditions.

Describe Area Affected and Cleanup Action Taken.*
No cleanup required with a gas release.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Mitch Morris	Approved by Environmental Specialist: 	
Title: Environmental Specialist	Approval Date: 1/10/17	Expiration Date:
E-mail Address: Mitch.Morris@williams.com	Conditions of Approval: —	Attached <input type="checkbox"/>
Date: 12/05/2016	Phone: 505-632-4708	

* Attach Additional Sheets If Necessary

NCS 1701037593

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Release Notification and Corrective Action

OPERATOR Initial Report Final Report

Name of Company: Williams Four Corners LLC	Contact: Mitch Morris
Address: Arroyo 1755 Arroyo Drive, Bloomfield, NM 87413	Telephone No.: (505) 632-4708
Facility Name: Chaco Compressor Station	Facility Type: Compressor Station

Surface Owner: BLM	Mineral Owner	API No.
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	27	29N	11W					San Juan

Latitude 36.690708° N Longitude -107.978413° W

NATURE OF RELEASE

Type of Release: Natural Gas Condensate	Volume of Release: 20 BBL	Volume Recovered: 20 BBL
Source of Release: Condensate Tank	Date and Hour of Occurrence: Estimated 10/18/2016 at 7:55 AM MST	Date and Hour of Discovery: Estimated 10/18/2016 at 7:55 AM MST
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour: N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. Not Applicable	

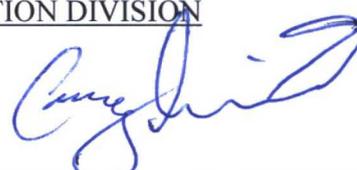
OIL CONS. DIV DIST. 3

If a Watercourse was Impacted, Describe Fully.* Not Applicable	NOV 04 2016
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Describe Cause of Problem and Remedial Action Taken.*
Telemetry on the tank level indicator was not properly calibrated, allowing natural gas condensate liquids to overflow the tank into lined secondary containment. All of the released liquids were recovered from secondary containment and telemetry on the tank level indicator were properly calibrated the same day.

Describe Area Affected and Cleanup Action Taken.*
All of the liquids released were recovered from secondary containment.

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Signature: 		OIL CONSERVATION DIVISION	
Printed Name: Mitch Morris		Approved by Environmental Specialist: 	
Title: Environmental Specialist		Approval Date: <u>11/10/17</u>	Expiration Date:
E-mail Address: Mitch.Morris@Williams.com		Conditions of Approval: _____	Attached <input type="checkbox"/>
Date: 11/01/2016	Phone: (505) 632-4708		

* Attach Additional Sheets If Necessary

#NES 1701037312

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